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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

WYATT B. and NOAH F. by their next friend
Michelle McAllister; KYLIE R. and ALEC R.
by their next friend Kathleen Megill Strek;
UNIQUE L. by her next friend Annette Smith;
SIMON S. by his next friend Paul Aubry;
RUTH T. by her next friend Michelle Bartov;
BERNARD C. by his next friend Ksen Murry;
NAOMI B. by her next friend Kathleen
Megill Strek; and NORMAN N. by his next
friend Tracy Gregg, individually and on
behalf of all others similarly situated,

Case No. 6:19-cv-00556-AA

**DEFENDANTS' OBJECTIONS TO
PLAINTIFFS' AMENDED AND
REBUTTAL TRIAL EXHIBIT LISTS**

Plaintiffs,

v.

TINA KOTEK, Governor of Oregon in her
official capacity; FARIBORZ
PAKSERESHT, Director, Oregon Department
of Human Services in his official capacity;
APRILLE FLINT-GERNER, Director, Child
Welfare in her official capacity; and OREGON
DEPARTMENT OF HUMAN SERVICES,

Defendants.

Defendants object to the following exhibits offered by plaintiffs. These objections incorporate defendants' motions *in limine*. (Dkt. 422.) Plaintiffs filed an amended exhibit list on April 23, 2024, which listed Exhibits 442–490. These exhibits had not previously been disclosed. (See Dkt. 403.) Plaintiffs filed a rebuttal exhibit list on April 29, 2024, listing exhibits 491-597. Defendants respond and object to plaintiffs' proposed Exhibits 442-597 as follows.

Ex.	Description	Bates	Stipulations	Objections
442	Youth Respite Policy Oregon			Hearsay. FRE 802. Authenticity. FRE 901.
443	Length of Stay Presentation	Wyatt_DHS_2 937509		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.B.
444	POP 2023-25	Wyatt_DHS_2 961621		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Best evidence rule. FRE 1002. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A. and V.
445	5/10/22 Email exchange between Glenda Marshall, Sara Fox et al	Wyatt_DHS_3 177346		Only part of the whole document has been offered. The rest of the

Ex.	Description	Bates	Stipulations	Objections
				document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A.
446	11/20/22 Email exchange between Donald Erickson, Liesl Wendt et al	Wyatt_DHS_4 432567		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A.
447	Service Delivery Report Lincoln County			No objection.
448	D15 Quality Improvement Meeting	Wyatt_DHS_4 674444		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including

Ex.	Description	Bates	Stipulations	Objections
				Motion I.B., I.C., II, and III.A.
449	System of Care Advisory Council 2023 Data Report			Hearsay. FRE 802. Authenticity. FRE 901.
450	May 2022 District/Office Report	Wyatt_DHS_3 234605		No objection.
451	11/29/2022 Email exchange between Deena Loughary, Carolyn Nevins et al	Wyatt_DHS_3 234815		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion II and III.A.
452	12/2/2022 Email exchange between Rebecca Jones Gaston, Deena Loughary et al	Wyatt_DHS_3 034737		Authenticity. FRE 901. Hearsay. FRE 802.
453	1/18/2023 Email exchange between Kathy Steiner, Chandra Snyder et al	Wyatt_DHS_3 236723		Authenticity. FRE 901. Hearsay. FRE 802.
454	1/13/2023 Email exchange between Deena Loughary, Kailash Changer et al	Wyatt_DHS_3 236650		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion II and III.A.

Ex.	Description	Bates	Stipulations	Objections
455	Professional Competency, Integrity and Justice in Social Work: A study of CPS Dispositions	Wyatt_DHS_3 236652		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion II and III.A.
456	12/13/2022 Email exchange between Elizabeth Alston and Deena Loughary	Wyatt_DHS_3 631875		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A.
457	Screening Report	Wyatt_DHS_2 984290		Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> .
458	12/12/2022 Email exchange between Kristen Khammohack, Deena Loughary et al	Wyatt_DHS_2 984286		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence

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				more probable or less probable. FRE 401. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion III.B.
459	1/17/2023 Email exchange between Jessika Glassrock, Desiree Saucedo et al	Wyatt_DHS_3 622893		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Hearsay. FRE 802.
460	Meeting Title: 2023 OCWP Meeting January 10, 2023	Wyatt_DHS_3 622895		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion II and III.A.
461	Incident ages			Not relevant because it does not tend to make any fact of consequence

Ex.	Description	Bates	Stipulations	Objections
				more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
462	Number of incidents			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
463	11/21/2022 Email exchange between Sonya Buchholtz, Erin Anhoury et al	Wyatt_DHS_3 631322		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802. Authenticity. FRE 901.
464	Oregon Department of Human Services Child Welfare: Safety Program	Wyatt_DHS_3 631324		Authenticity. FRE 901.
465	D2 CW Dashboard Outcomes February 2024	Wyatt_DHS_4 681652		No objection.
466	House Bill 2333 Report April 2023	Wyatt_DHS_4 680565		No objection.
467	House Bill 2333 Report April 2024	Wyatt_DHS_4 681412		No objection.
468	Length of Stay in Months March 2024	Wyatt_DHS_4 681301		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.B.
469	Maltreatment in Foster Care by Year Comparison	Wyatt_DHS_4 681487		No objection.

Ex.	Description	Bates	Stipulations	Objections
470	Data Review of Disproportionality and Branch Trends D2	Wyatt_DHS_4 681590		No objection.
471	D12 Presentation	Wyatt_DHS_4 680597		Hearsay. FRE 802. Authenticity. FRE 901.
472	DHS Child Welfare CPS Assessments Caseload Detail			Hearsay. FRE 802. Authenticity. FRE 901.
473	Child Welfare System of Care Dashboard			This document has not been provided to defendants. Defendants reserve the right to object if it is provided.
474	SOC Barrier Form Tracking and Response			Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901.
475	Identifying Capacity Needs for Children within the Oregon Child Welfare System	Wyatt_DHS_1 550419		No objection.
476	1/6/2023 Email exchange between Sara Fox, Alex Salas et al	Wyatt_DHS_3 201552		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A.
477	CPS Assessment Load	Wyatt_DHS_2 729186		Hearsay. FRE 802. Authenticity. FRE 901. Best evidence rule. FRE 1002.

Ex.	Description	Bates	Stipulations	Objections
478	CPS Assessment Load	Wyatt_DHS_2 729189		Hearsay. FRE 802. Authenticity. FRE 901. Best evidence rule. FRE 1002.
479	CPS Assessment Load	Wyatt_DHS_2 729192		Hearsay. FRE 802. Authenticity. FRE 901. Best evidence rule. FRE 1002.
480	CPS Assessment Load	Wyatt_DHS_2 729195		Hearsay. FRE 802. Authenticity. FRE 901. Best evidence rule. FRE 1002.
481	Child Welfare Questions for Key Informants	Wyatt_HMA_0 0000027		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901.
482	Trial home visit datasheet	Wyatt_DHS_2 758325		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion III.A.
483	Trial home visit reunification datasheet	Wyatt_DHS_2 758326		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed

Ex.	Description	Bates	Stipulations	Objections
				by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion III.A.
484	Child Welfare Division Progress Report April 2023			No objection.
485	Trial home visit datasheet	Wyatt_DHS_2 758327		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion III.A.
486	Trial reunification datasheet	Wyatt_DHS_2 758333		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion III.A.

Ex.	Description	Bates	Stipulations	Objections
487	ODHS Child Welfare Caseload Ratio Standards	Wyatt_DHS_2 716760		Best evidence rule. FRE 1002.
488	May 2022 Statewide Report	Wyatt_DHS_3 234651		No objection.
489	Oregon [Context Data]			Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Best evidence rule. FRE 1002. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion II and III.A.
490	Executive Order 19-03	Wyatt_DHS_0 057587		No objection.
491	April 15, 2024 Order, <i>M.D. bnf Stukenberg et al. v. Abbott et al.</i> , U.S. District Court, S.D. Tex., Case No. 2:11-CV-00084, ECF 1560.			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.
492	Exit Plan and Agreement, Charlie and Nadine H. et al. v. Murphy et al., U.S. District Court, D.N.J., Case No. 2:99cv-03678, ECF 373.			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
493	Co-Neutral 19 th Commentary, <i>D.G. v. Yarborough</i>			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
494	Foster Care Report for Youth	Wyatt_DHS_0 627487		Hearsay. FRE 802.
495	DHS Administrator Emails re Capacity Oct. 22	Wyatt_DHS_3 852344		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A. and III.
496	DHS Administrator Emails re Capacity Mar, 22	Wyatt_DHS_3 170639		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in</i>

Ex.	Description	Bates	Stipulations	Objections
				<i>Limine</i> , including Motion I.A.
497	Emailed complaint re timely hearing notice, Jul. 22	Wyatt_DHS_4 107541		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion II.B.
498	DHS emails re lack of placements, TL usage	Wyatt_DHS_3 516726		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A. and V.
499	DHS emails re TL of youth, lack of resources	Wyatt_DHS_3 825250		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A. and V.
500	DHS emails re youth boarded in ED	Wyatt_DHS_3 823869		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A.
501	DHS emails re youth living in tent	Wyatt_DHS_4 644326		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A. and V.
502	Feb 2023 CW Presentation	Wyatt_DHS_4 663113		No objection.
503	PK report draft presentation 2016	Wyatt_DHS_2 990666		Hearsay. FRE 802. Authenticity. FRE 901.
504	Emails between DHS and Casey	Wyatt_DHS_2 988008		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802. Authenticity. FRE 901.

Ex.	Description	Bates	Stipulations	Objections
505	DHS emails 12.9.22	Wyatt_DHS_2 984236		Hearsay. FRE 802. Authenticity. FRE 901.
506	Email to DHS about ADA training feedback	Wyatt_DHS_4 328022		Hearsay. FRE 802. Authenticity. FRE 901.
507	DHS report disability outcomes	Wyatt_DHS_3 207294		Hearsay. FRE 802. Authenticity. FRE 901.
508	DHS emails re lack of placements	Wyatt_DHS_3 162940		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A.
509	DHS emails re ADA coordinator position	Wyatt_DHS_3 005085		Hearsay. FRE 802. Authenticity. FRE 901.
510	DHS email re complaints on LGBTQ issues	Wyatt_DHS_2 983397		Hearsay. FRE 802. Authenticity. FRE 901.
511	Discussion from March 2022 process for VRA	Wyatt_DHS_2 954908		Hearsay. FRE 802. Authenticity. FRE 901.
512	DHS email re disability data process	Wyatt_DHS_2 937090		Hearsay. FRE 802. Authenticity. FRE 901.
513	Dec 2022 mtg notes	Wyatt_DHS_3 200812		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in

Ex.	Description	Bates	Stipulations	Objections
				Defendants' Motion <i>in Limine</i> , including Motion I.A. and V.
514	2021 emails re crises in cw	Wyatt_DHS_4 411821		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A.
515	ACF, US DHHS, Child Maltreatment 2022 report	Online link		Hearsay. FRE 802. Authenticity. FRE 901.
516	4.22 report on family retention	Wyatt_DHS_4 662276		No objection.
517	SOCAC minutes, Dec. 2023	Wyatt_DHS_4 670687		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion I.A.
518	Foster family retention report Feb 2024	Wyatt_DHS_4 676312		No objection.

Ex.	Description	Bates	Stipulations	Objections
519	Emails among DHS staff re BH services	Wyatt_DHS_4 432567		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' <i>Motion in Limine</i> , including Motion I.A.
520	OAR 413, Div. 17 – CIRT and Discretionary Reviews - 2019			No objection.
521	OAR 413, Div. 17 – CIRT and Discretionary Reviews - 2024			No objection.
522	Oregon SB 832 – Enrolled; 2019 Regular Session			No objection.
523	Oregon SB 942 – Enrolled; 2017 Regular Session			No objection.
524	“After Almost a Decade, DHS Adopts Rules Mandated by Law.” Salem Statesman Journal; 02.26.2017			Hearsay. FRE 802. Authenticity. FRE 901.
525	“44 Children Left in Harm’s Way...” Salem Statesman Journal; 03.24.2017			Hearsay. FRE 802. Authenticity. FRE 901.
526	“Oregon Child Welfare Agency to Change Fatality Review...” Salem Statesman Journal; 09.30.2019			Hearsay. FRE 802. Authenticity. FRE 901.
527	“Buried: The State Hides How Children Die on			Hearsay. FRE 802. Authenticity. FRE 901.

Ex.	Description	Bates	Stipulations	Objections
	Oregon's Watch...;" The Oregonian; 11.25.2018			
528	"Lawmakers to Question State Officials, Mull Stricter Rules...;" The Oregonian; 11.26.2018			Hearsay. FRE 802. Authenticity. FRE 901.
529	"Oregon's DHS Director Didn't See Major...;" OPB; 03.20.2017			Hearsay. FRE 802. Authenticity. FRE 901.
530	Witness registration re SB832; Senate Human Services Committee; 03.26.2019			Hearsay. FRE 802. Authenticity. FRE 901.
531	Witness registration re SB942; Senate Human Services Committee; 03.27.2017			Hearsay. FRE 802. Authenticity. FRE 901.
532	Info. Meeting; House Committee on Early Childhood and Human Services; 02.28.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions <i>in Limine</i> , including Motion I.C. and V.
533	Statement of Kim Montgomery to House Committee on Early Childhood and Human Services; 02.28.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions <i>in Limine</i> , including Motion I.C. and V.

Ex.	Description	Bates	Stipulations	Objections
534	Oregon HB 2804 – Enrolled; 2023 Regular Session			No objection.
535	Hearing re HB 2804; House Committee on Early Childhood and Human Services; 02.15.2023			Hearsay. FRE 802. Authenticity. FRE 901.
536	Witness registration re HB 2804; House Committee on Early Childhood and Human Services; 02.15.2023			Hearsay. FRE 802. Authenticity. FRE 901.
537	Statement of Anthony Castaneda [SEIU Local 503] to House Committee on Early Childhood and Human Services; 02.15.2023			Hearsay. FRE 802. Authenticity. FRE 901.
538	Statement of SEIU Local 503 to House Committee on Early Childhood and Human Services; 02.15.2023			Hearsay. FRE 802. Authenticity. FRE 901.
539	Oregon SB 548 – Enrolled; 2023 Regular Session			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.
540	Hearing re SB 548; Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
541	Witness registration re SB 548; Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.

Ex.	Description	Bates	Stipulations	Objections
542	Witness registration re SB 548A; Senate Committee on Human Services; 04.24.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.
543	Statement of Bryan Alford to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
544	Statement of Wendy Bender to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
545	Statement of Marcy Bretz to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
546	Statement of Jhana Brown to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.

Ex.	Description	Bates	Stipulations	Objections
				Improper law witness opinion. FRE 701.
547	Statement of Cindy Cosenzo to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
548	Statement of Kittee Custer to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
549	Statement of Heidi Evans to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
550	Statement of Sophie Fashana to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
551	Statement of Beth Fitzpatrick to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more

Ex.	Description	Bates	Stipulations	Objections
				probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
552	Statement of Mercury Foix to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
553	Statement of Ian Ford to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
554	Statement of Rebecca Gundel to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
555	Statement of Amanda Holguin to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.

Ex.	Description	Bates	Stipulations	Objections
556	Statement of Cheyenne Jones to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
557	Statement of Jennifer Kinzey to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
558	Statement of Linda Martensen to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
559	Statement of Allison Montelongo to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
560	Statement of Meghan Newton to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.

Ex.	Description	Bates	Stipulations	Objections
				Authenticity. FRE 901. Improper law witness opinion. FRE 701.
561	Statement of Bryan Oakley to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
562	Statement of Dr. Michelle Pliske to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
563	Statement of Sherri Sacconaghi to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
564	Statement of Anna Schmidt to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
565	Statement of Leah Smith to Senate Committee on			Not relevant because it does not tend to make any fact of consequence more

Ex.	Description	Bates	Stipulations	Objections
	Human Services; 02.22.2023			probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
566	Statement of Michael Steffany to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
567	Statement of Seema Steffany to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
568	Statement of Victoria Wolff to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness opinion. FRE 701.
569	Hearing re DAS insurance fund to Joint Subcommittee on General Government; 02.14.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in

Ex.	Description	Bates	Stipulations	Objections
				Defendants' <i>Motions in Limine</i> , including Motion VII.
570	Presentation re DAS insurance fund to Joint Subcommittee on General Government; 02.14.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' <i>Motions in Limine</i> , including Motion VII.
571	Press conference re 2018 Oregon SOS Audit; 01.31.2018			Hearsay. FRE 802. Authenticity. FRE 901.
572	OAR 413-015-0608 – 0608 re CPS, Out of Home Care Assessments; 2017			No objection.
573	OAR 413-015-0604 re CPS, Out of Home Care Assessments; 2024			No objection.
574	OAR 413-015-0606 re CPS, Out of Home Care Assessments; 2024			No objection.
575	OAR 413-015-0608 re CPS, Out of Home Care Assessments; 2024			No objection.
576	KATU: "DHS: Long Child Abuse Hotline Wait Times...;" 05.04.2019			Hearsay. FRE 802. Authenticity. FRE 901.
577	KATU: "DHS Blames Low Funding...;" 04.25.2019			Hearsay. FRE 802. Authenticity. FRE 901.
578	KGW: "Mandatory Reporters Frustrated...;" 01.01.2022			Hearsay. FRE 802. Authenticity. FRE 901.
579	Oregon Capital Chronicle: "Callers Face Long Waits...;" 02.02.2022			Hearsay. FRE 802. Authenticity. FRE 901.

Ex.	Description	Bates	Stipulations	Objections
580	Statesman Journal: “Oregon Child Abuse Hotline Launch Marred...;” 04.25.2019			Hearsay. FRE 802. Authenticity. FRE 901.
581	02.28.2024 testimony of Alyssa Shiprack to OR House Early Childhood and Human Services Committee.			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness testimony. FRE 701. Inadmissible for the reasons explained in Defendants’ Motions <i>in Limine</i> , including Motion I.C. and V.
582	02.28.2024 testimony of Jamie Stockdale to House Early Childhood and Human Services Committee.			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness testimony. FRE 701. Inadmissible for the reasons explained in Defendants’ Motions <i>in Limine</i> , including Motion I.C. and V.
583	DHS-DL contract [submitted to Senate Human Services Committee]			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants’ Motion <i>in Limine</i> , including Motion V.

Ex.	Description	Bates	Stipulations	Objections
584	DHS/ Pakseresht 02.05.2024 memo to Senate Human Services Committee re CW contractors; TL and litigation			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion IV and V.
585	Gelser 02.06.2023 memorandum; submitted to Senate Human Services Committee re "Gaps in safety and accountability for kids [in TL/ TLP]."			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness testimony. FRE 701. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V and VIII.
586	Hearing; update on TL to House Interim Committee on Early Childhood and Human Services; 01.10.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V.
587	Presentation; DHS update on TL to House Interim Committee on Early Childhood and Human Services; 01.10.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in

Ex.	Description	Bates	Stipulations	Objections
				Defendants' Motion <i>in Limine</i> , including Motion V.
588	Hearing; re TL to House Interim Committee on Early Childhood and Human Services; 09.27.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V.
589	Presentation; DHS update on TL to House Interim Committee on Early Childhood and Human Services; 09.27.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V.
590	Hearing; Gelser testimony re SB1521 to House Committee on Early Childhood and Human Services; 02.26.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness testimony. FRE 701. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V and VIII.
591	Hearing; DHS testimony re preventing TL to Joint Committee on Ways and Means; 02.12.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.

Ex.	Description	Bates	Stipulations	Objections
				Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V.
592	Presentation; DHS presentation on preventing TL to Joint Committee on Ways and Means; 02.12.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V.
593	Hearing; re SB1521 to Senate Committee on Human Services; 02.07.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V.
594	Hearing; re SB1521 to Senate Committee on Human Services; 02.12.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V.

Ex.	Description	Bates	Stipulations	Objections
595	DHS Memo to Senate Committee on Human Services; 02.09.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V.
596	DHS Memo to Senate Committee on Human Services; 02.14.2024			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V.
597	Statement of Wendy Simer re SB1521 to Senate Committee on Human Services; 02.22.2023			Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Improper law witness testimony. FRE 701. Inadmissible for the reasons explained in Defendants' Motion <i>in Limine</i> , including Motion V.

DATED: May 6, 2024.

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